{In Archive} NHOU

Michael Massey to: gene.lucero, Goins, Doug, KAE, NDupont, nberger, susan.scott, rthompson, rew, lglmoon, Gallagher, Mike, Mitchell.Cohen, 07/23/2010 11:59 AM

Cc: Kelly Manheimer, Kim Muratore, "Feldman, Elise (ENRD)"

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Thank you for participating in Tuesday's meeting.

Attached are EPA's power point presentations.

Presentation for 072010 PRP Meeting.pptx TechOverviewforPRPs.ppt

EPA would like to schedule the meeting for technical presentations on Thursday, August 26 in Los Angeles. If for some reason you are unable to participate in the meeting on that day and would like to make a presentation, there will likely be additional opportunities to do so. Any party that intends to make a presentation on August 26 should notify me no later than Friday, August 6.

Thank you,

Mike

Michael Massey
Office of Regional Counsel
EPA Region 9, ORC-3
75 Hawthorne Street
San Francisco, California 94105
Phone: 415 972-3034
Fax: 415 947-3570
massey.michael@epa.gov

Second Interim Remedy
North Hollywood Operable Unit of the San Fernando Valley Area 1 Superfund Site

July 20, 2010

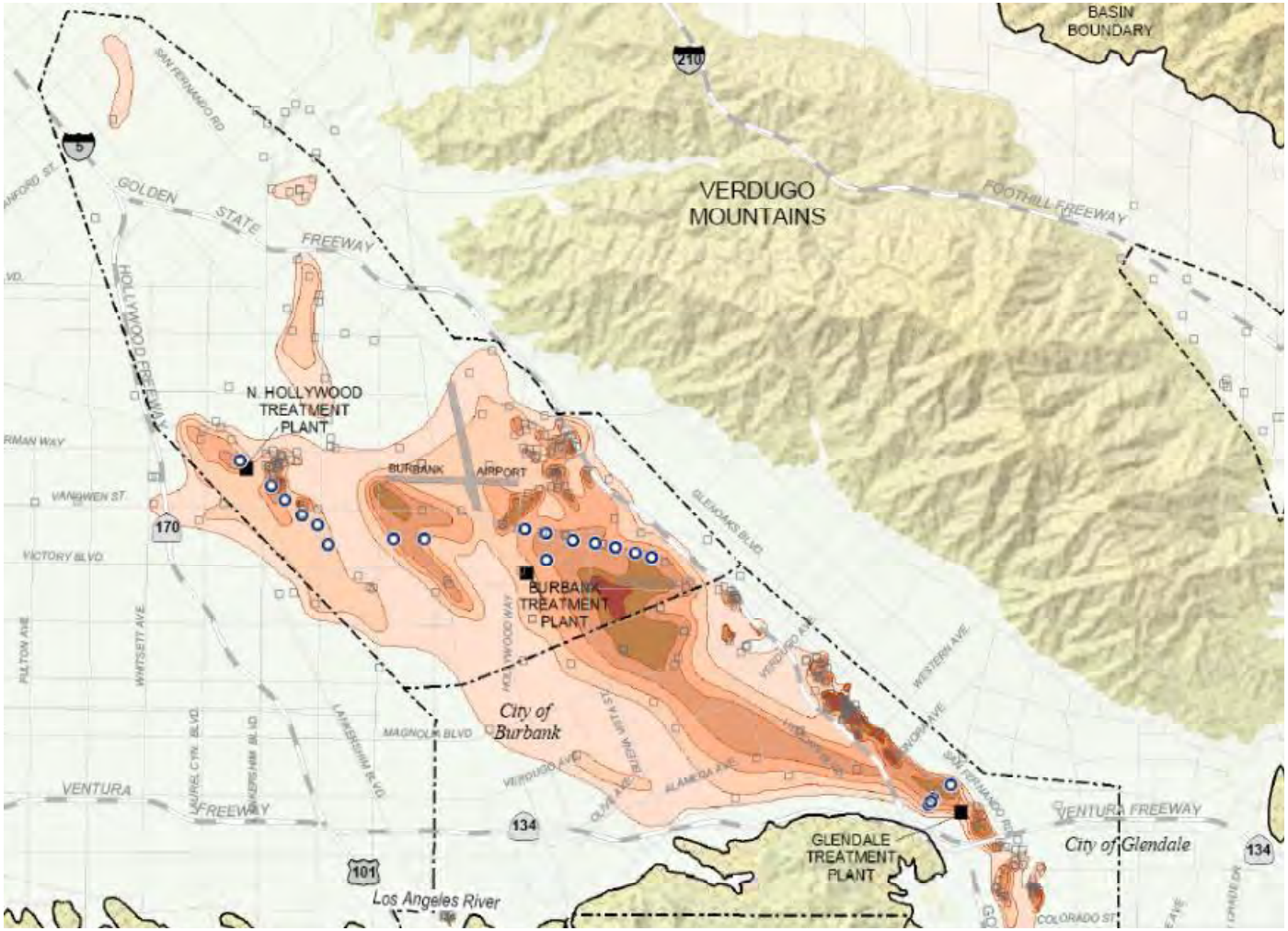
Site History

- Sampling for contamination in the San Fernando Valley ("SFV") followed the **discovery of PCE and TCE** in San Gabriel Valley groundwater in 1979.
- Four SFV superfund sites listed on EPA's **National Priorities List** ("NPL") in 1986.
- EPA selected the first interim remedy for the North Hollywood Operable Unit ("NHOU") in a **1987 Record of Decision** ("1987 ROD").
- The first interim remedy was constructed and began operating in 1989. It continues to operate today and is operated by the Los Angeles Department of Water and Power ("LADWP") in conjunction with its **domestic water supply** infrastructure. It consists of **eight groundwater extraction wells**, an air stripper, and activated carbon filters to treat solvent contamination in SFV groundwater, principally TCE and PCE.

Site History

- As of 2009, approximately 8 billions gallons of water have been extracted by the NHOU remedy wells.
- As of 2009, approximately 6,000 pounds of VOCs have been removed from NHOU groundwater.
- Extracted water has been successfully treated to reduce solvent levels below state and federal drinking water standards.
- See EPA's Focused Feasibility Study ("FFS")(July 10, 2009); Proposed Plan (July 2009); and Record of Decision ("ROD")(September 30, 2009) for additional background information.
- Primary NHOU documents are available on EPA Region 9's website: www.epa.gov/region09/SanFernandoNorthHollywood

Upper
TCE Groundwater Plume



Enforcement History

- 1996 and 1997 Consent Decrees
  - Recovered past costs (for remedy construction and operation) as well as projected operation and maintenance ("O&M") costs for remainder of 15-yr term of first interim remedy.
  - 37 signatories (including 22 third parties) cashed out for scope of first interim remedy as defined in the 1987 ROD.
- 2008 Interim Funding
  - 1996 and 1997 CD settlement funds were exhausted in the fall of 2008. Additional funding was needed to keep the first interim remedy operating until the second remedy was constructed.
  - EPA collected $1,412,920 pursuant to both the Administrative Order on Consent ("AOC") and the Unilateral Administrative Order ("UAO").
  - Three parties remain out of compliance with UAO. $349,080 outstanding.
  - O&M for first interim remedy is funded through Summer of 2011.
- 2009 AOC for monitoring well installation
  - Honeywell approached EPA with an offer to install majority of the monitoring wells identified by the EPA in the 2008 FFS.
  - Honeywell has installed 30 monitoring wells.
  - Data from new monitoring wells is being used to refine plume maps.

Why a Second Remedy? And why is it Interim?

- There are still significant amounts of TCE and PCE in NHOU groundwater.
- EPA's 3rd and 4th Five-Year Reviews of the first interim remedy (2003 & 2008) concluded that the TCE and PCE plume was migrating beyond the remedy's zone of hydraulic containment.
- Expiration of the Term of the 1987 ROD.
  - The 1987 ROD called for 15 years of groundwater extraction and treatment (1989 – 2004) as an interim remedy. The funds collected pursuant to the '96 and '97 CDs in order to complete 15 years of O&M were exhausted in 2008.
- Ongoing investigations of NHOU groundwater revealed the presence of contaminants not addressed by the first interim remedy, e.g., hexavalent chromium and 1-4 dioxane, at levels requiring treatment.
- The second remedy is an "interim" remedy because there is currently not enough data available to design a remedy that will restore the aquifer to levels achieving MCLs. Once sufficient data has been collected and all contaminant sources have been addressed, a final remedy will feasible.

Potentially Responsible Parties

- EPA sent special notice to 21 parties on July 1, 2010.
- All special notice parties are affiliated with the 10 source properties that were the subject of the '96 and '97 CDs.
  - Former Lockheed Facility at what is now the Burbank-Glendale-Pasadena Airport
  - Hawker Pacific Aerospace facility
  - Former Fleetwood Machine Products facility
  - Tuxford Landfill
  - Former Allied Signal and Honeywell facility
  - Former Pacific Steel Treating facility
  - Hewitt Pit
  - Penrose Landfill
  - Bradley Landfill
  - Gregg Pit/Benz Dump
- Recipients include both current and former owners and operators at the 10 source properties.

Map of Source Areas

Ongoing EPA PRP Search Efforts

- Over the past four years EPA has:
  - Reviewed files at 7 state and local agencies with jurisdiction over environmental, health, and waste issues.
  - Reviewed approximately 500 parties for potential liability.
    - EPA reviewed parties that used COCs and parties with a history of spills or other environmental violations and it reviewed soil and groundwater sampling data from throughout the basin.
  - EPA has reviewed or is in the process of reviewing 59 parties that have been recommended for review by existing PRPs.
- EPA has made a decision not to pursue approximately 440 parties. As many as 200 additional parties may still be reviewed.
- In addition to 21 special notice recipients, EPA has prioritized the investigation of parties associated with 16 newly identified potential source areas. EPA will provide information regarding new potential source areas and associated parties when its investigation is complete.
- Depth of the vadose zone requires EPA to spend additional time and resources to identify new PRPs at new source areas.

What is EPA Asking of the PRPs?

- Implementation (design, construction, operation) of the second interim remedy in accordance with the 2009 ROD.
- Continued funding of O&M for the first interim remedy until the second interim remedy is operational.
- Payment of EPA oversight costs associated with remedy implementation.
- Payment of NHOU past costs.
  - Costs for FFS, ROD, PRP search, etc.
  - $10,306,723.
- Payment of basin-wide costs.
  - NHOU share of basin-wide investigation costs incurred by EPA since April 1992.
  - $2,708,864.

Role of LADWP in Consent Decrees

- LADWP has expressed interest in signing the CD – not as a PRP.
- LADWP will, in coordination with the PRPs and EPA, implement the institutional controls under the second interim remedy, i.e., the groundwater management plan, to ensure that LADWP pumping and remedy operations are coordinated in order to maximize remedy effectiveness and LADWP access to its drinking water resources.
- LADWP may hand operational responsibility for the remedy over to PRPs.

Significant Consent Decree Issues

- EPA will provide individual PRPs the opportunity to give technical presentations to the group.
- Allocation of liability
  - Allocation is the PRPs' responsibility.
  - EPA does not consider prior allocation to be binding precedent.
  - EPA expects all parties to pay for remediation of solvent contamination.
  - EPA expects parties receiving special notice for chromium to bear the costs of addressing the chromium contamination.
- Additional PRPs
  - Those identified early in negotiations may be included immediately.
  - Those identified later in negotiations or after a CD is signed will be addressed through a separate process.

Expedited Preliminary Design

- Honeywell has proposed to conduct the preliminary design for the second interim remedy pursuant to an AOC in order to gather additional data prior to execution of the CD.
- EPA is willing to consider an expedited preliminary design under the following conditions:
  - Sufficient number of PRPs must participate,
  - Expedited AOC negotiations,
  - Continued CD negotiations, and
  - CD signed in early 2011.

Potential Small Party Cashouts

- EPA is considering the possibility of small party cash outs for two parties.
- Small party cashout criteria: party must have contributed a small volume of contamination to the NHOU plumes and must be geographically distinct from highest concentrations of contamination.
  - Parties that don't meet both criteria will not be considered.
- Separate CDs for eligible parties. Limited to liability for the second interim remedy.
- PRP group will have the opportunity to review and comment on the technical issues before EPA makes a final decision to cashout a small party.

Path Forward

- New CD to implement and fund second interim remedy. Draft CD and draft statement of work included with 7/1/10 special notice letter.
- Potential for preliminary design AOC
- If CD negotiations are not productive, EPA will issue a UAO to implement second interim remedy.

Schedule

- Negotiations
  - Technical presentations in the second week of August.
  - Monthly meetings in LA and/or San Francisco beginning on date good faith offer is made.
  - Bi-weekly teleconferences beginning after the first monthly meeting.
- RD/RA negotiation schedule
  - Extension of RD/RA schedule for 60 days secured.
  - Pressure to use enforcement tools.

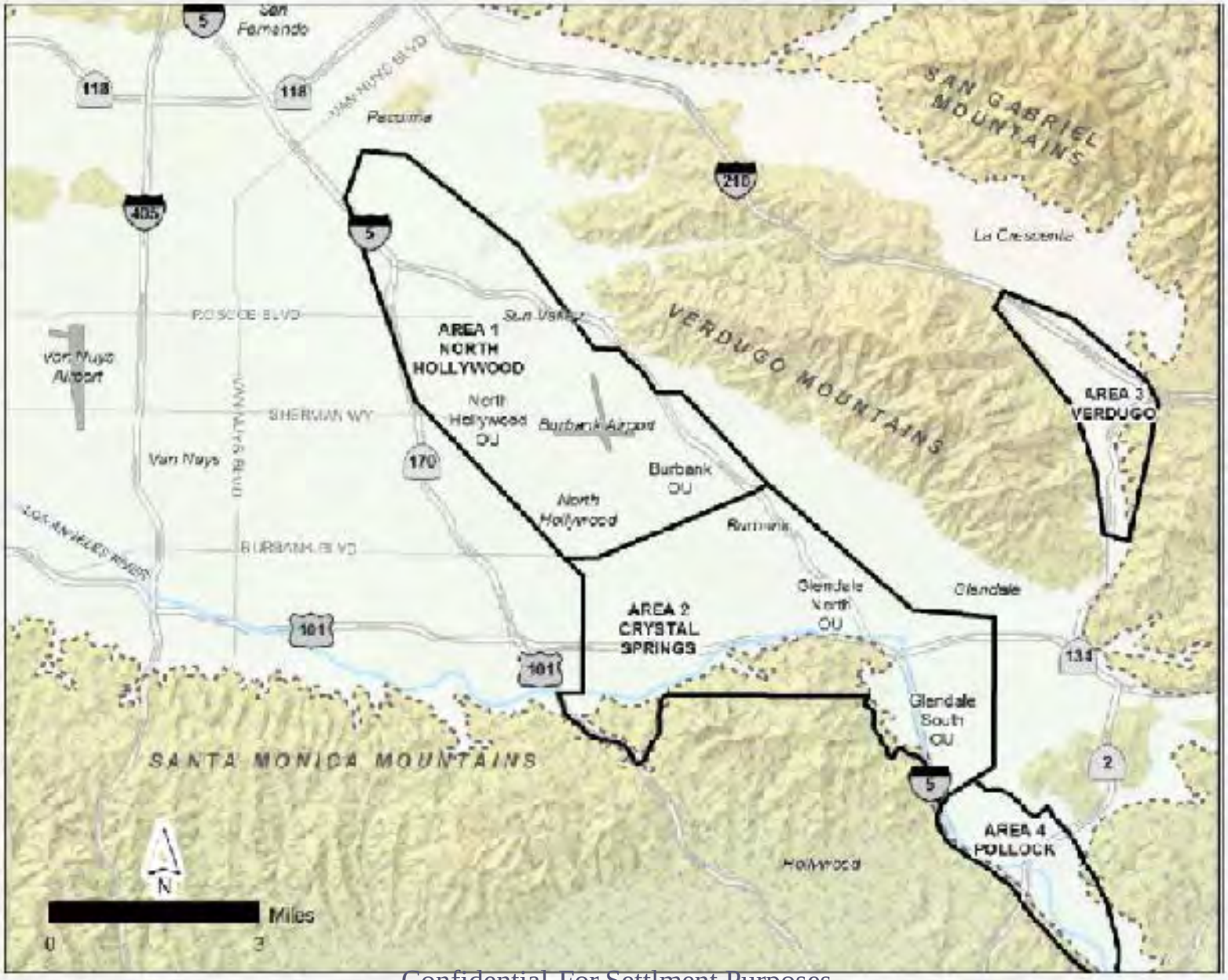
Technical Overview

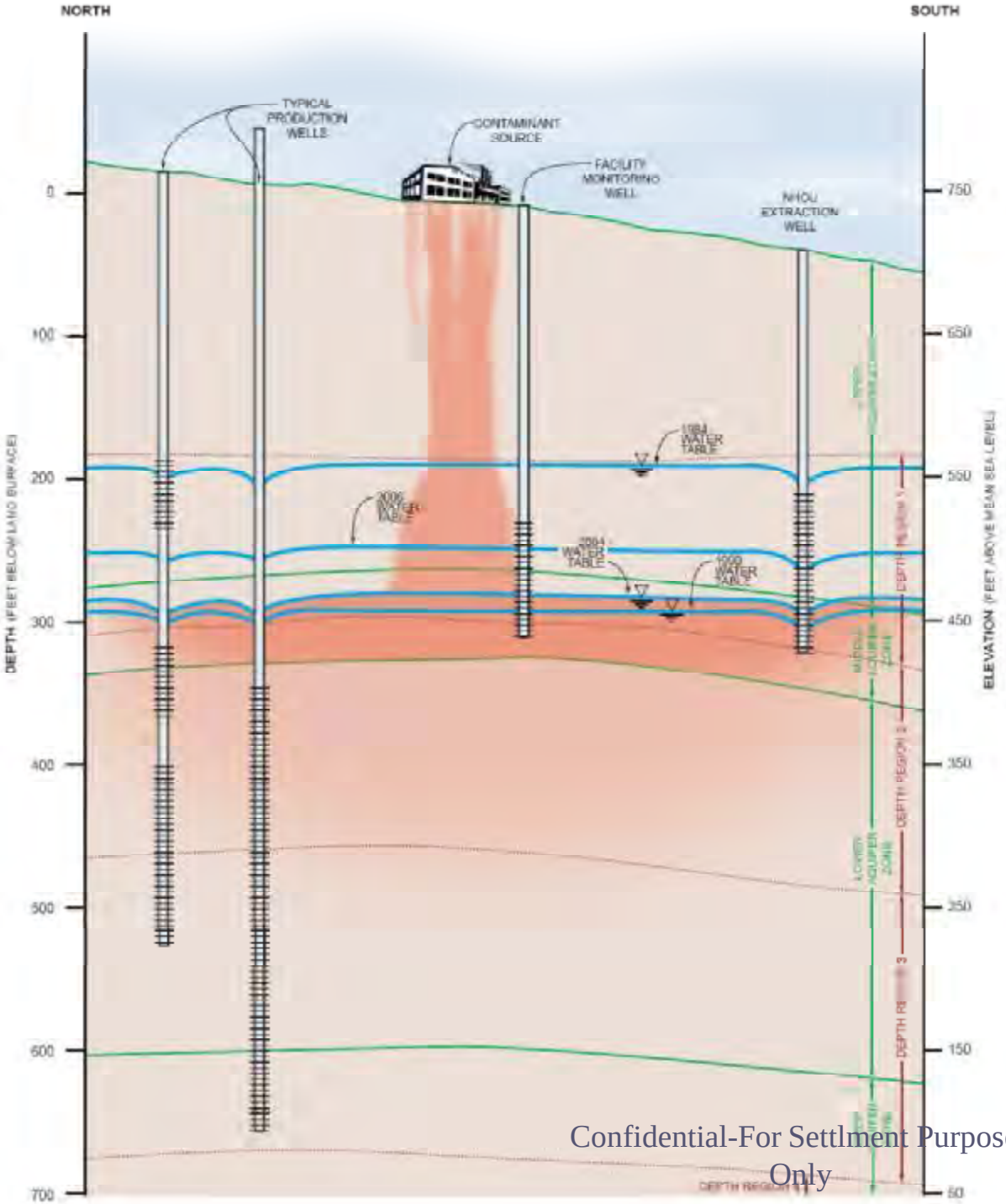
North Hollywood Operable Unit
San Fernando Valley Area 1 Superfund Site
North Hollywood, CA

U.S. EPA
Region 9

Agenda

- Site History and Setting
- Second Interim ROD
- Groundwater Wells Installed by Honeywell
- Comments/Questions?



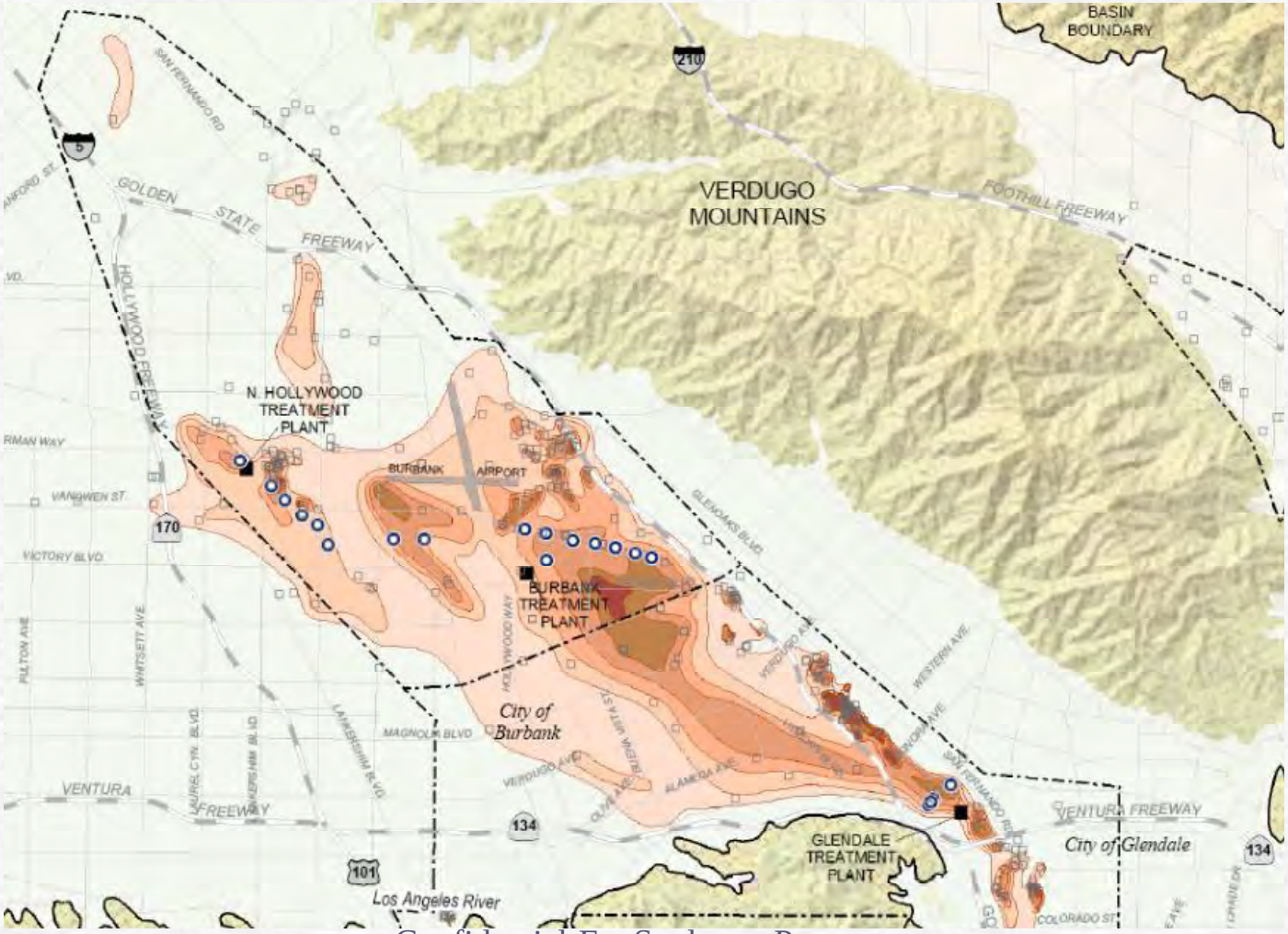


Source Zone and Underlying Groundwater Contamination

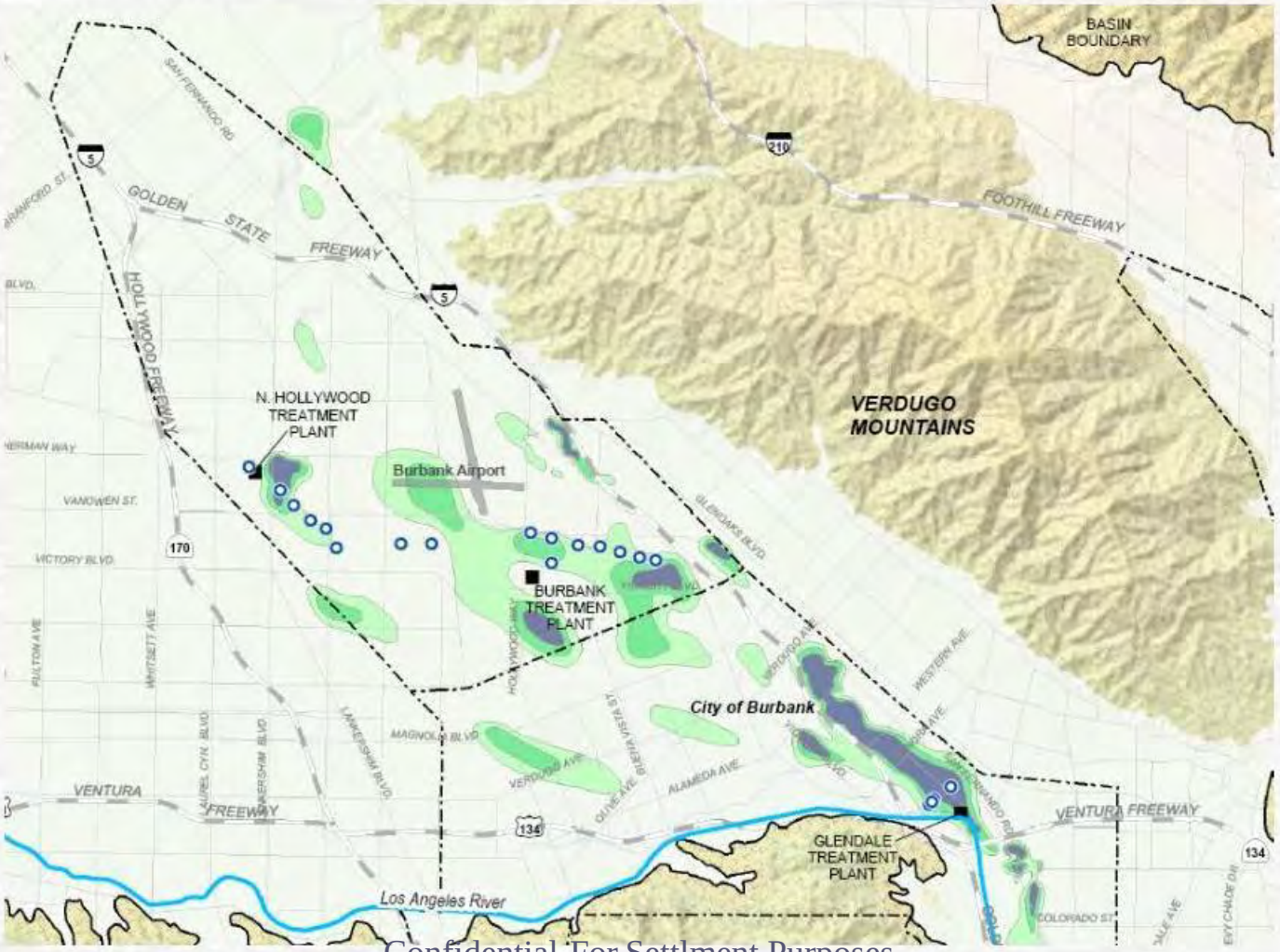
Existing NHOU Interim Remedy

- Remedial action objectives & end-use
  - Contain VOC plume and remove contaminant mass
  - Provide treated water to the City of Los Angeles
- Began operation in December 1989
  - Eight extraction wells, only seven operational
  - Operated by Los Angeles Department of Water and Power (LADWP)
- Uses air stripping to remove VOCs from groundwater
  - Treated groundwater is chlorinated, mixed with other waters for drinking water use by LADWP
- Has treated 8 billion gallons of groundwater, removed 6,000 pounds of VOCs

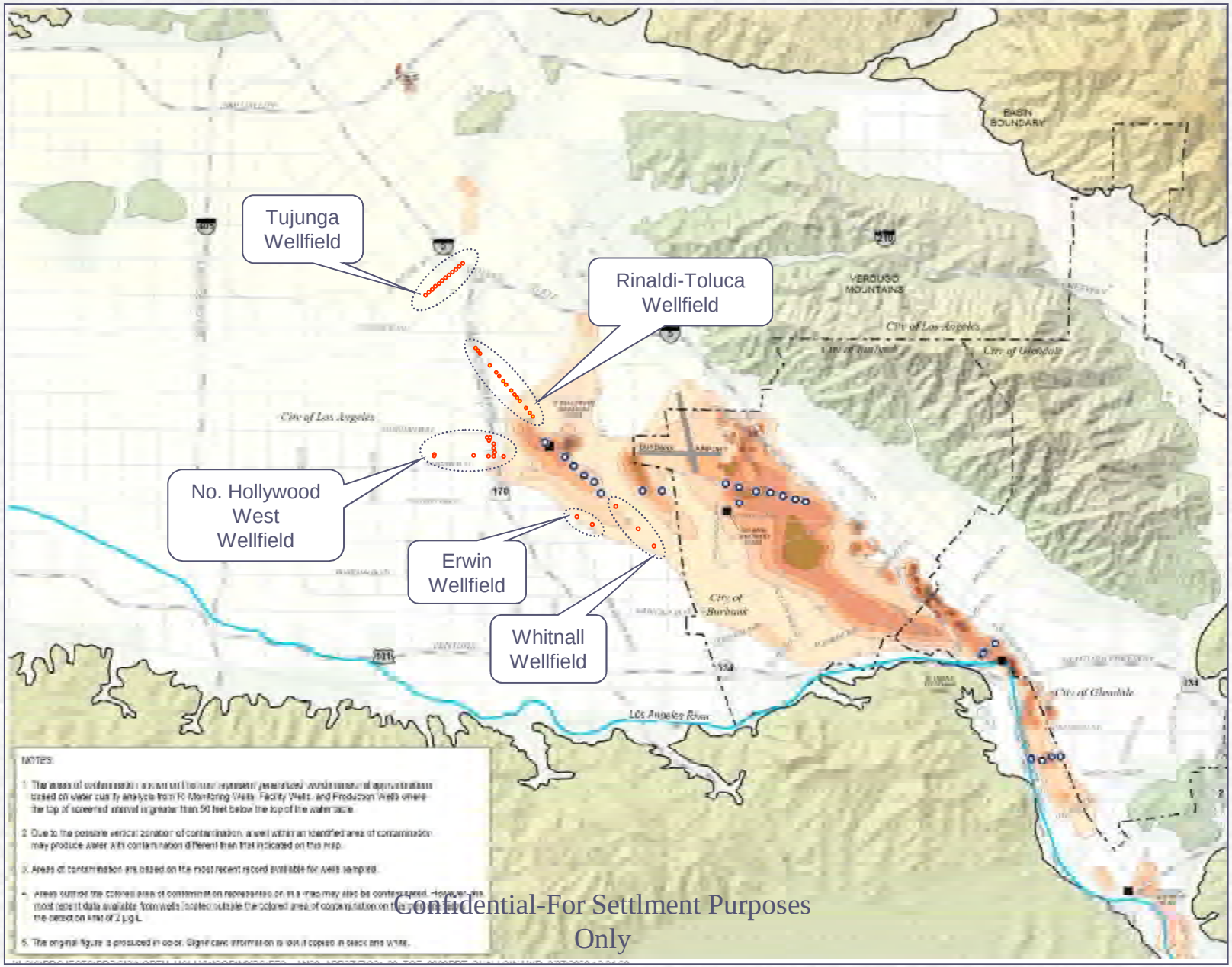
Upper
TCE Groundwater Plume



Chromium Groundwater Plume



LADWP Production Wellfields



Second Interim ROD

- Developed based on 2009 Focused Feasibility Study (FFS)
- Primary concerns:
  - Emerging contaminants
  - Inability of Existing Interim Remedy to contain the plume

Contaminants of Concern

- TCE, PCE – Solvents widely used as industrial cleaning and degreasing agents
- Hexavalent chromium – Inhibit corrosion in cooling towers; metal plating
- 1,4-Dioxane – Stabilizing agent added to TCE/TCA; also found in paint strippers, dyes, greases, varnishes, waxes, antifreeze, aircraft de-icing fluids

Cleanup Levels

- Drinking water end-use:
  - Federal and state maximum contaminant levels (MCLs)
  - State notification levels for chemicals without MCLs
  - 5 micrograms per liter (µg/L) for hexavalent chromium

Components of Selected Remedy

- Institutional controls
  - Written agreement between EPA and LADWP to ensure appropriate balance between drinking water production and the NHOU remedy
- Expanded groundwater and treatment system monitoring
  - 37 new monitoring wells at 23 distinct locations
- Deepen and refurbish existing extraction wells
  - Improve capture of the VOC plume
- Construct new extraction wells
  - Improve hydraulic containment in northwest
- Refurbish existing air stripper and add a second air stripper for VOC treatment
- Wellhead treatment to remove chromium and 1,4-dioxane at extraction well NHE-2
- Ex situ chromium treatment for the combined flow from well NHE-1 and two new extraction wells (NEW-2 and NEW-3)

New Monitoring Wells

- Honeywell has installed some of the new monitoring wells required by the Second Interim ROD
  - Conducted under AOC with EPA
  - Installed 30 wells at 18 locations (some not required by the ROD)
  - 1 well yet to be installed by Honeywell
  - Approximately 6 monitoring wells remaining to be installed